WC Docket No. 07-22

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

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FCC - MAILROOM

The FCC should deny FairPoint's proposed acquisition of Verizon's telephone operations in Maine, New Hampshire and Vermont because it would not serve the public interest. FairPoint, a small, highly leveraged firm, will not have the financial or technical resources required to successfully conduct these operations. Approval of the transaction would not only place consumers, workers and communities at significant risk but also would set a bad precedent for the whole country.

FairPoint is just not up to the task. Its shaky finances pose significant concerns and risks. It will add $1.7 billion in debt, and as a result it may not have sufficient money to make important investments because of its hefty interest bill.

FairPoint's operational and managerial capacity also is inadequate. Management would have to deal with a 614 percent increase in access lines and a 333 percent increase in employees. Moreover, there is a significant risk that FairPoint will run into delays and cost overruns when it replaces Verizon's 600 operational, administrative and support systems, further undermining its ability to serve the public.

When companies like FairPoint run into problems, they usually cut back on labor costs and capital expenditures while attempting to increase rates. Customers end up paying more for worse service. Communities would suffer from reduced broadband build-out.

Approval of the FairPoint sale by the FCC also would send a signal encouraging other large telephone companies to sell off their rural operations to smaller companies that do not have the resources or capacity to improve services or provide truly high-speed broadband.

The FCC should deny the transaction because the public interest risks overwhelm any supposed benefits.

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Date Signed

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